

Title: Routine Retailer Monitoring Visits

Purpose

Monitoring visits allow the WIC Program to examine actual stocking variety and quantity, to review WIC benefits already accepted that day, and to participate in an educational buy. This information allows the WIC Program to detect possible fraud and/or abuse, discuss with the retailer staff any problems/solutions, and the opportunity to clarify any misunderstandings or misconceptions.

Authority

7 CFR 246.12(j)

Policy

It is the policy of the Montana WIC Program that an authorized retailer receives a routine monitoring visit at least once during each contract period. The Montana WIC Program may request the local WIC retailer coordinator to conduct such visits.

I. Retailer Monitoring

- A. Monitoring visits allow the Montana WIC Program to review a retailer “in action.” The monitoring visit is performed in accordance with federal regulations and will be conducted for each contracted retailer at least once during each contract period.
- B. The monitor should be able to:
 - 1. Verify the store signs are posted;
 - 2. Verify food prices are clearly posted either on the shelves or on the individual food items;
 - 3. Examine actual stocking variety and quantity;
 - 4. Review WIC benefits already accepted by the retailer;
 - 5. Participate in an educational buy;
 - 6. Discuss any problems the retailer has experienced;
 - 7. Clarify any misunderstandings or misconceptions;
 - 8. Offer suggestions to improve the processing and handling of WIC benefits;
 - 9. Use the above to determine if a potential for fraud or abuse exists.
- C. Monitoring Staff
 - 1. Monitoring staff are employees of the WIC Program. The monitoring staff for a routine visit will be an employee of either the WIC State office or WIC Local Agency office.

IV. Educational/Training Visit

- A. An educational/training visit is defined as an overt purchase made with WIC benefits by WIC staff. The purchase is made with the knowledge of the retailer’s management, though not necessarily that of the retailer staff.
- B. Criteria
 - 1. Educational/training visits are scheduled based on data compiled at the State office indicating inappropriate benefit cashing procedures, or would be

scheduled at the request of the retailer for training purposes. The educational/ training visit may be part of a regularly scheduled monitoring visit.

2. The purpose of the educational/training visit is to educate/train retailer staff in the appropriate WIC transaction procedures. This purchase may help determine problem areas in retailer procedures.

C. Procedure

1. Two weeks before conducting the visit, contact the State office and request benefits to be used during the Educational Buy. Contact the retail manager and explain the purpose of the visit. Explain the following to the retail manager: *An educational visit will be done to determine any training cashiers require to complete a WIC transaction.*
2. WIC staff will enter the premises of the retailer, noting date and time of the visit on the "Monitoring Visit" form.
3. WIC staff will select items (may be non-authorized WIC foods, larger sizes of authorized foods or non-food items) and proceed to the check stands
4. Do not mix personal items with WIC items during this educational purchase.
5. Have a WIC Program Booklet with you and note if the cashier asks for it and compares the signatures.
- ~~6.~~ Have a variety of eligible and non-eligible items.
7. Mention to the cashier that a WIC benefit will be used before the transaction begins.
8. The WIC staff member should follow any instructions the store personnel may give with regard to the transaction.
9. Do not question or dispute any instructions given by the cashier.
 - a. Answer questions asked by the cashier with an "I'm not sure" response.
 - b. After signing the benefit, but prior to the cashier processing it, notify the cashier that an educational buy has been completed for Montana WIC and have them void the transaction.
 - c. Discuss the results of the visit with the retail manager.
 - d. Suggest the cashier(s) be present.
 - e. Complete the visit form, including the signature of the retail manager.
 - f. Discuss any need for store personnel training. Suggest they review the Montana DPHHS training (check if they have a copy) and offer on-site training by WIC staff.
 - g. Return the items used in the educational visit back to the shelves before you leave the store.

D. Follow-up

Erroneous practices will be discussed with either the staff or the management after the purchase has been completed. The WIC benefits used during this visit will NOT be processed through the banking system. The purchase will

be 'voided' at the check stand. The WIC benefits will be returned to the State office with the visit forms.